

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Case No. 11-CR-20129
Hon. Robert H. Cleland

v.

D-40 PAULA MILEHA FRISCIONI,

Defendant.

DEFENDANT PAULA MILEHA FRISCIONI'S RESPONSE TO THE UNITED STATES'
MOTION TO CONSOLIDATE

Defendant, PAULA MILEHA FRISCIONI, by and through her counsel, McManus Law, PLLC, hereby respond to the Government's Motion to Consolidate and, for the reasons indicated in the attached Memorandum of Law, does not object to the Motion to Consolidate.

Respectfully submitted,

/s/John M. McManus
JOHN M. McMANUS (P44102)
Attorney for Defendant Friscioni
McManus Law, PLLC
999 Haynes, Suite 205
Birmingham, MI 48009
(248) 642-5288

Dated: August 15, 2012

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FOR THE EASTERN DISTRICT OF MICHIGAN
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MEMORANDUM OF LAW

Defendant, Paula Mileha Friscioni, concurs with the relief requested by the Government. For pretrial purposes only, the case of *United States v. Scott William Sutherland, et al.* (Case No. 11-20129) should be consolidated with the *United States v. Jeff Garvin Smith, et al.* (Case No. 11-20066) and *United States v. Smile Villa* (Case No. 12-20387).

Respectfully submitted,

/s/John M. McManus
JOHN M. McMANUS (P44102)
Attorney for Defendant Friscioni
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CERTIFICATE OF SERVICE

John M. McManus deposes and states that he is employed by McManus Law, PLLC, and that on the 15th day of August, 2012, he gave permission to Kim Chapman to file Defendant, Paula Mileha Friscioni's Response to the United States' Motion to Consolidate via ECF to all counsel of record.

/s/John M. McManus